

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

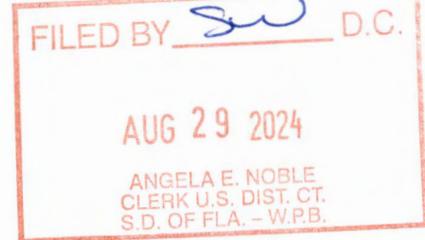
9:2024-CR-80107-Middlebrooks/Matthewman

CASE NO. \_\_\_\_\_

18 U.S.C. § 1029(a)(5)

18 U.S.C. § 982(a)(B)

18 U.S.C. § 1029(c)(1)(C)



UNITED STATES OF AMERICA

vs.

VANESSA RODRIGUEZ,

Defendant.

INDICTMENT

The Grand Jury charges that:

COUNT 1

Fraud in Connection with Access Devices  
(18 U.S.C. §1029(a)(5))

From on or about January 1, 2020, and continuing through on or about December 31, 2020, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

VANESSA RODRIGUEZ,

did knowingly, and with the intent to defraud, effect transactions with one or more access devices issued to other persons, that is, credit cards issued to Victim 1 and Victim 2, to receive payment and any other thing of value during any one-year period, the aggregate value of which is equal to or greater than \$1,000, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

**COUNT 2**  
**Fraud in Connection with Access Devices**  
**(18 U.S.C. §1029(a)(5))**

From on or about January 1, 2021, and continuing through on or about December 31, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**VANESSA RODRIGUEZ,**

did knowingly, and with the intent to defraud, effect transactions with one or more access devices issued to other persons, that is, credit cards issued to Victim 1 and Victim 2, to receive payment and any other thing of value during any one-year period, the aggregate value of which is equal to or greater than \$1,000, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

**COUNT 3**  
**Fraud in Connection with Access Devices**  
**(18 U.S.C. §1029(a)(5))**

From on or about January 1, 2022, and continuing through on or about December 31, 2022, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**VANESSA RODRIGUEZ,**

did knowingly, and with the intent to defraud, effect transactions with one or more access devices issued to other persons, that is, credit cards issued to Victim 1 and Victim 2, to receive payment and any other thing of value during any one-year period, the aggregate value of which is equal to or greater than \$1,000, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

**COUNT 4**  
**Fraud in Connection with Access Devices**  
**(18 U.S.C. §1029(a)(5))**

From on or about January 1, 2023, and continuing through on or about December 31, 2023, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**VANESSA RODRIGUEZ,**

did knowingly, and with the intent to defraud, effect transactions with one or more access devices issued to other persons, that is, a credit card issued to Victim 2, to receive payment and any other thing of value during any one-year period, the aggregate value of which is equal to or greater than \$1,000, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

**FORFEITURE ALLEGATIONS**

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendant, **VANESSA RODRIGUEZ**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1029, as alleged in this Indictment, the defendant shall forfeit to the United States of America the following:

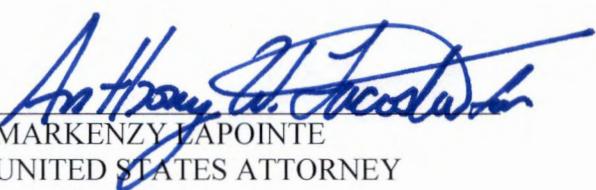
(a) any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such offense, pursuant to Title 18, United States Code, Section 982(a)(2)(B); and

(b) any personal property used, or intended to be used, to commit such offense, pursuant to Title 18, United States Code, Section 1029(c)(1)(C).

All pursuant to Title 18, United States Code, Sections 982(b)(1) and 1029(c)(1)(C), and the procedures set forth at Title 21, United States Code, Section 853, as made applicable by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2).

A TRUE BILL

FOREPERSON

  
MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

  
JONATHAN BAILYN  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: 9:2024-CR-80107-Middlebrooks/Matthewman

v.

VANESSA RODRIGUEZ

## Court Division (select one)

Miami       Key West       FTP  
 FTL       WPB

## CERTIFICATE OF TRIAL ATTORNEY

## Superseding Case Information:

New Defendant(s) (Yes or No)       Number of New Defendants       Total number of counts       

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No  
List language and/or dialect:
4. This case will take 4 days for the parties to try.
5. Please check appropriate category and type of offense listed below:  
(Check only one) (Check only one)
 

I <input checked="" type="checkbox"/> 0 to 5 days	☐ Petty
II <input type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes, Judge        Case No.
7. Has a complaint been filed in this matter? (Yes or No) No  
If yes, Magistrate Case No.
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge        Case No.
9. Defendant(s) in federal custody as of
10. Defendant(s) in state custody as of
11. Rule 20 from the        District of
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) No
15. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
16. Did this matter involve the participation of or consultation with now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? Yes

By: Jonathan Baily

Jonathan Baily

Assistant United States Attorney

Court ID No. A5502602

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Vanessa Rodriguez

Case No: 9:2024-CR-80107-Middlebrooks/Matthewman

Counts #: 1-4

Fraud in Connection with Access Devices

Title 18, United States Code, Section 1029(a)(5)

\* **Max. Term of Imprisonment:** 15 Years' Imprisonment

\* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

\* **Max. Supervised Release:** 3 Years

\* **Max. Fine:** \$250,000

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.